

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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JOSEPH JACKSON,

Plaintiff,

Case No.: CV-18-1206

NASSAU COUNTY; THE INCORPORATED VILLAGE
OF FREEPORT; DETECTIVE ROBERT DEMPSEY;
DETECTIVE GARY ABBONDANDELO; DETECTIVE
JOHN M. HOLLAND; DETECTIVE MICHAEL HERTS;
DETECTIVE MARTIN ALGER; DETECTIVE
ANTHONY SORRENTINO; DETECTIVE DAVID L.
ZIMMER; POLICE OFFICER MELENDEZ;
LIEUTENANT BURDETT; SERGEANT MCHALE;
SERGEANT NOLL; DETECTIVE SHARKEY; POLICE
OFFICER DOWDELL; POLICE OFFICER BARRY
MCGOVERN; DETECTIVE TURNER; DETECTIVE
EDWARD HAGGERTY; POLICE OFFICER HALL;
DETECTIVE LAURETTE KEMP; DETECTIVE
WILLIAM TWEEDY; DETECTIVE ANTHONY KOSIER;
DETECTIVE SERGEANT DAN SEVERIN; DETECTIVE
JERL MULLEN; THE ESTATE OF DETECTIVE JERL
MULLEN; JOHN DOE, AS THE ADMINISTRATOR OF
THE ESTATE OF JERL MULLEN, and JOHN and JANE
DOE 1 through 20,

AFFIDAVIT

Defendants.
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HOWARD E. COLTON, an attorney duly admitted to practice law before the Courts of
the State of New York, being duly sworn, deposes and says:

1. I am the Village Attorney for the Incorporated Village of Freeport ("Village").
2. The statements made herein are based on my personal knowledge, unless stated
upon information and belief and, as to those statements, I believe them to be true for the reasons
stated.

3. On behalf of the Incorporated Village of Freeport, at this juncture, the Village is not aware of known witnesses other than the named defendants who have discoverable information in this matter.

Dated: Uniondale, New York
October 31, 2019


HOWARD E. COLTON, ESQ.

Sworn to before me this
day of October, 2019


Notary Public

A.
MAUREEN ANGLIM
NOTARY PUBLIC State of New York
No. 01AN806667
Qualified in Nassau County
Commission Expires

November 26, 2021